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COSTCO WHOLESALE CORPORATION

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JESSICA SOSA GUZMAN, an individual;

CASE NO.: 2:22-cv-02070-CDS-BNW

Plaintiffs,

vs.

COSTCO WHOLESALE CORPORATION, a
foreign corporation dba COSTCO, DOE
EMPLOYEES I through X, and ROE
BUSINESS ENTITIES I through X inclusive,

Defendants.

STIPULATION AND ORDER TO CONTINUE SETTLEMENT CONFERENCE
(1st Request)

Plaintiff, JESSICA SOSA GUZMAN (hereinafter referred to as “Ms. Guzman” or “Plaintiff”), by and through counsel, Kevin Hansen, Esq. and Amanda Harmon, Esq. of the law firm Law Offices of Kevin R. Hansen, and Defendant, COSTCO WHOLESALE CORPORATION (hereinafter referred to as “Costco”), by and through counsel, Edgar Carranza, Esq. and Megan E. Wessel, Esq. of the law firm MESSNER REEVES LLP, hereby submit the instant stipulation and order

1 to continue the Settlement Conference from May 21, 2024 to June 17, 2024 pursuant to Local Rule
2 7-1 and 16-5 as follows:

3 1. On November 8, 2022, Plaintiff filed her Complaint against Costco with the Eighth
4 Judicial District Court for Clark County, Nevada.

5 2. On December 1, 2022, Costco filed its Answer denying Plaintiff's allegations and
6 denying all liability for the injuries.

7 3. On December 14, 2022, Costco filed its Petition of Removal and removed the matter
8 to this Court based upon diversity jurisdiction. [Doc No. 1]. On January 19, 2023, Costco filed its
9 Statement Regarding Removal. [Doc. No. 10].

10 4. The parties participated in the Fed. R. Civ. P. 26(f) conference on December 28, 2022,
11 and filed their proposed Joint Discovery Plan and Scheduling Order which was entered by this Court
12 on January 11, 2023. [Doc. No. 8].

13 5. The Parties have been engaged in discovery. Initially, they exchanged their respective
14 Fed. R. Civ. P. 26 disclosures, and subpoenaed applicable medical records and billing. In addition,
15 the Parties served multiple sets of written discovery requests to each other, all of which have been
16 responded to. Depositions of the Parties have been completed.

17 6. On November 13, 2023, Costco filed its Motion for Summary Judgment. [Doc. No.
18 19]. Plaintiff filed her Opposition on December 3, 2023 [Doc. No. 20] and Costco filed its Reply on
19 December 18, 2023. [Doc. No. 22]. The motion has not yet been ruled on.

20 7. On January 11, 2024, this Court issued a Minute Order referring this case to a
21 Settlement Conference before U.S. Magistrate Judge Brenda Weksler. [Doc. No. 24]. On February
22 28, 2024, an Order Scheduling Settlement Conference was served setting the same for April 17, 2024,
23 at 10:00 am. [Doc. No. 25]

24 8. On April 8, 2024, a Minute Order was issued continuing the Settlement Conference to
25 May 21, 2024, at 10:00 am and setting the Pre-Settlement Conference for May 20, 2024, at 3:00 pm
26 and requiring settlement briefs to be submitted by May 14, 2024, at 4:00 pm. [Doc No. 26].

27 9. Counsel for Costco is unavailable on May 21, 2024.
28

10. The Parties have conferred and hereby stipulate to continue the Settlement Conference to **June 17, 2024, at 10:00 am**. Pre-Settlement Conference and submission of confidential settlement briefs shall be scheduled at this Court's discretion.

DATED this 18th day of April, 2024

DATED this 18th day of April, 2024.

MESSNER REEVES LLP

LAW OFFICE OF KEVIN R. HANSEN

/s/ Edgar Carranza

/s/ Amanda Harmon

By:

By:

Edgar Carranza, Esq.
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Attorneys for Plaintiff
JESSICA SOSA GUZMAN

IT IS SO ORDERED...

Event	Current Deadline	Updated Deadline
Settlement Conference	May 21, 2024, at 10:00 am	August 23, 2024, at 10:00 am
Pre-Settlement Conference	May 20, 2024, at 3:00 pm	August 22, 2024, at 3:00 pm
Submission of Confidential Briefs	May 14, 2024, at 4:00 pm	August 16, 2024, at 4:00 pm

DATED this 23 day of April, 2024.


UNITED STATES MAGISTRATE JUDGE

Patti Sherretts

From: Amanda Harmon <amandah@kevinrhansen.com>
Sent: Thursday, April 18, 2024 9:05 AM
To: Patti Sherretts
Cc: Edgar Carranza; Alex Gomez; Megan Wessel
Subject: RE: Costco adv. Guzman

[EXTERNAL EMAIL]

You may add my e-signature.

Sincerely,

Amanda A. Harmon, Esq.
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From: Patti Sherretts <PSherretts@messner.com>
Sent: Wednesday, April 17, 2024 3:32 PM
To: Amanda Harmon <amandah@kevinrhansen.com>
Cc: Edgar Carranza <ECarranza@messner.com>; Alex Gomez <alex@kevinrhansen.com>; Megan Wessel <MWessel@messner.com>
Subject: Costco adv. Guzman

Ms. Harmon:

Please see the attached correspondence which is being sent on behalf of Edgar Carranza. If you have any questions, please contact Mr. Carranza directly.

Thank you.

PATTI SHERRETTS

Legal Assistant

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